

Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)
AZ-040-2006-0002
U.S. Department of the Interior
Bureau of Land Management (BLM)

Note: This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled "Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy" transmitting this worksheet and the "Guidelines for Using the DNA Worksheet" located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision.)

A. **BLM Office:** Safford Field Office

Lease/Serial/Case File No. AZA

Proposed Action Title/Type: Anasazi Foundation, Inc. SRP

Location of Proposed Action: Graham County

Description of the Proposed Action: The Anasazi Foundation has requested a permit to operate a state licensed wilderness youth therapy program consisting of hiking and instruction in outdoor survival skills within the Safford Field Office. The Foundation is a non-profit (501c3) nationally accredited behavioral healthcare provider for youth and young adults. They have had previous permits within the SFO from 1993 to 1996. Anasazi operates with a continuous flow model. Every week new clients arrive and depart from the groups. The average length of stay is 42 days. Proposed routes within the SFO include Eagle Creek, Bonita Creek, the San Francisco River, and the Gila River. All routes are planned to avoid private property and official campgrounds. Anasazi staff are trained in Leave No Trace principles and ethics. Each week the group will hike to a new destination. Weekly location updates are emailed to land use administrators and all incidents are documented and reported to all licensing agencies and permit providers. Average group size is 3-8 with a maximum of 9. Number of guides per group is 2-3. This would be a five year permit.

Applicant (if any): _____

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name*	Safford Resource Management Plan (RMP)	Date Approved	ROD Part I Sept. 1992 and ROD Part II July, 1994
LUP Name*	_____	Date Approved	
Other document**	_____	Date Approved	
Other document**	_____	Date Approved	
Other document**	_____	Date Approved	

*List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

**List applicable activity, project, management, water quality restoration, or program plans.

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

X The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:

The Safford District will endeavor to provide a variety of recreational opportunities that meet public demand and are compatible with the Bureau's stewardship responsibilities.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

Special Recreation Permits for Commercial Recreation Activities on Public Lands in Arizona EA Number AZ-931-93-001 and EA Number AZ-040-08-14.

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Yes

Documentation of answer and explanation:

The proposed actions are provided for in the Safford RMP. Additionally the existing special recreation permit EA for commercial recreation activities on public lands in Arizona analyzes day use and multiple day trips for commercial recreation operators who propose activities that comply with the standard stipulations shown in Attachment A of the EA. Much of the EA analyzes overnight camping, multiple day activities, vehicle use, use of pack stock, use of campfires, and use of latrines. The Anasazi Foundation's use of the public lands is to provide a youth therapy program consisting of hiking and instruction in outdoor survival skills within the Safford Field Office.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances? Yes

Documentation of answer and explanation:

The trips the Anasazi Foundation proposes are included in the types of activities analyzed in the 1993 SRP EA. The types of activities proposed are covered by the analysis of the existing EA.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed

Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action? Yes

Documentation of answer and explanation:

The existing EA analyzes two alternatives, the Proposed Action Alternative (issues a commercial permit with stipulations) and the No Action Alternative (no permitting). That range of alternatives adequately covers the Anasazi Foundation's proposed hikes. There has been no significant change in the circumstances or significant new information germane to the Proposed Action. Additional wildlife species have been listed under the Endangered Species Act since preparation of the existing EA, but state and federal wildlife management agencies have not prohibited or restricted hunting, trail riding, or wildlife viewing and photography on BLM administered public lands in their efforts to manage these species. The proposed activities would not significantly impact T&E wildlife species when carried out under the permit stipulations. There are no issues regarding invasive species, water quality, and Environmental Justice.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action? Yes

Documentation of answer and explanation:

The methodology/analytical approach previously used is appropriate for the Proposed Action. Since the existing EA covers a broad range of commercial recreation activities over a large area (public lands in the entire State of Arizona), the analysis is somewhat general in nature. The proposed commercial activities, however, are simple, and really no different than the same activities carried out by thousands of private hunters, hikers, and horseback riders using public lands annually. The analysis in the existing EA is appropriate to cover the effects of the proposed operations.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action? Yes

Documentation of answer and explanation:

The direct and indirect impacts of the proposed guiding business are not significantly different than those identified in the existing SRP EA. The impacts of these activities would be less than many of the overnight activities analyzed in the existing EA. Further, additional beneficial economic impacts would result from the issuance of a permit for the proposed guiding activity.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)? Yes

Documentation of answer and explanation:

The proposed guiding business would not change the analysis of cumulative impacts in the existing EA because it is included in the types of commercial activities analyzed in that EA. Further, the existing environment has not changed substantially since 1993, necessitating further analysis of impacts from commercial recreation uses.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action? Yes

Documentation of answer and explanation:

Public involvement in the existing SRP was substantial. About 700 EAs were mailed for review and comment during preparation of the analysis. Many individuals, organizations, and agencies were asked to review the EA.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Resource Represented</u>
Deborah Morris	Recreation
Anna Rago	Cultural Resources
Tim Goodman	Wildlife, T&E Animal Species
Phil Cooley	Range/ Nonnative/Invasive Plants
Tom Schnell	Soil, Water, Air /Wilderness/ACECs
Ted McRae	T&E Plant Species, Riparian
Scott Evans	Lands/Realty
Heidi Blasius	Fisheries
Larry Thrasher	Hazardous Materials
Jeff Wilbanks	Gila Box RNCA
Marlo Draper	Environmental Justice/NEPA

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

CONCLUSION

- ☐ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

Signature of the Responsible Official

Date